

**DECLARATION OF MARCELINE WHITE, ECONOMIC ACTION**

I, Marceline White, declare as follows:

1. I am the Executive Director of Economic Action Maryland Fund (“Economic Action”).

The statements made in this declaration are based on my personal knowledge.

2. Economic Action is a statewide nonprofit movement of individuals and organizations that advances economic inclusion and financial justice through research, advocacy, consumer education, and direct service.

3. We provide direct assistance to individuals in need today and fight for policies to change the system in the future. Our direct service programs support Maryland households struggling with housing, economic security, medical debt, and more.

4. For example, the Securing Older Adult Resources (SOAR) program is our initiative to ensure that older adults in Maryland have economic security. We help older adults to learn about and apply for available state tax credits, we provide financial coaching and counseling, and we do direct consumer education on financial exploitation, common scams, and digital literacy. We have used the Consumer Financial Protection Bureau’s educational materials to inform older adults about scams and encourage them to submit complaints to the CFPB.

5. Another big area of concern for us is medical debt. In 2020, 14% of Maryland residents reported having medical debt, and it can happen to anyone. It disproportionately impacts low-income communities and communities of color though. We provide resources to consumers to help them navigate medical debt. For example, our *Guide to Medical Debt*, which is available on

our website at <https://econaction.org/wp-content/uploads/2024/10/Guide-to-Medical-Debt-FINAL.pdf>, provides information to help people understand their options. One of the suggestions we recommend is that consumers who are the victims of illegal and abusive debt collection tactics file a complaint with the CFPB.

6. Economic Action is also committed to fair housing and we work to root out discrimination in housing and assist Maryland residents with resolving fair housing complaints. Our work in this area includes educating individuals and organizations about housing rights and taking fair housing complaints on behalf of those individuals and working to resolve them.

7. We have found that an important tool in helping people address the problems they encounter with financial scams, debt collection, medical debt, and in other financial issues is to submit complaints to the CFPB. Submitting a complaint online is a relatively quick and easy way that individuals can get answers from companies and get results.

8. If the CFPB complaint database were no longer available, our jobs would get a lot harder. We would lose an important tool for us and the people we serve to find solutions to their problems. Without the database, our counselors who work directly with consumers would need to devote more time and resources to get the same result. It's a lot harder fighting with a bank or debt collector when you're just an individual consumer. It's easier when the company is receiving your complaint from a government agency, which is what happens after we submit complaints through the CFPB's database.

9. The CFPB not only takes complaints, it makes public the ones that people want to share, in an anonymized and redacted format. We have found that this publication is an important and useful resource for multiple areas of our work, because it enables us to identify emerging

problems that can have serious consequences for consumers here in Maryland. Understanding those trends informs both our research, policy advocacy, and direct services. We use the complaint database to better understand issues that are particularly prevalent for Maryland consumers.

10. We don't just rely on the CFPB's complaint database to do our work, however. The CFPB provides lots of resources that simply aren't available anywhere else.

11. One of those resources is the information and data about mortgage loans that CFPB collects and publishes under the Home Mortgage Disclosure Act. HMDA requires lenders to report loan-level information about mortgages and mortgage applications, which the CFPB then compiles, analyzes and publishes. That information in turn helps groups like us to understand trends in the mortgage market, including identifying potential fair lending issues or where lenders are just failing to meet the housing needs of their communities. We use that information to inform both our advocacy and our direct services work.

12. There is no replacement for CFPB's HMDA database. No other source has such comprehensive or authoritative information about consumer mortgage lending. If the database were taken down or compromised in some way that we felt we could no longer rely on it, that would directly interfere with our ability to help borrowers and to advocate for fairer housing policies.

13. Like lots of nonprofits, we can't afford to devote more resources in one area without taking them away from important work in another. If the CFPB were defunded and unable to continue to operate its complaint system, to make available information such as the HMDA data, and to provide its many consumer education resources, Economic Action would have no choice

14. That response would be necessary because assisting individual consumers with complaints would become more time-consuming without access to the CFPB's complaint database. Operating with the same amount of staff hours, we would not be able to serve as many consumers, and even if we were to reduce staff time elsewhere to try to fill this need, our efforts would be less effective.

15. And that's without even getting to the harms to our organization and, most importantly, to consumers that would be caused by losing such a vital enforcement agency that oversees so many laws that protect the people we serve. We've seen firsthand the benefits the CFPB can produce for people here in Maryland, including stopping illegal practices and getting money back into people's pockets. I don't think there's any question that shutting down such an important agency is going to mean more scams, fraud, and abusive treatment of the kind we try to prevent and to help people deal with.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 12, 2025, in Baltimore, MD.

DocuSigned by:  
  
 /s/                     A5F6AAFD14B4495                      
 Marceline White